

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA	:	
	:	CRIMINAL ACTION
v.	:	
	:	NO. 1:08-CR-421-CAP
RICARDO GODFREY PINDER, JR.	:	

PROPOSED VOIR DIRE QUESTIONS

The United States of America, by and through its counsel, Sally Quillian Yates, United States Attorney for the Northern District of Georgia, and Jeffrey A. Brown, Assistant United States Attorney, submits the attached list of proposed voir dire questions to be presented to the prospective jurors to be examined in this case, under the procedures set forth in Rule 24(a), Federal Rules of Criminal Procedure.

Respectfully submitted,  
SALLY QUILLIAN YATES  
UNITED STATES ATTORNEY

/s/JEFFREY A. BROWN  
ASSISTANT UNITED STATES ATTORNEY

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**PART I.**

QUESTIONS TO BE ASKED INDIVIDUALLY TO  
EACH PROSPECTIVE JUROR

1. What is your name, and how old are you?
2. Residence:
  - a. Where do you live (neighborhood is sufficient)?
  - b. How long have you lived there?
  - c. Do you own or rent your home or residence?
  - d. If you have not lived at your current residence for the past five years, where did you live previously, and how long did you live at that location?
3. Employment:
  - a. Are you currently employed?
  - b. If yes, where do you work?
  - c. How long have you worked at that location?
  - d. What do you do at your place of work?
  - e. Do you supervise any other employees?
  - f. **If retired or currently unemployed:** What was your previous employment?
  - g. **If a homemaker:** Have you ever been employed outside the home?
4. Education:
  - a. What is your educational background?
  - b. If you attended college, please state your major.

- c. Do you have a post-graduate degree?
  - d. If so, in what field?
5. Marital Status:
- a. What is your marital status?
  - b. **If married:**
    - (1) Does your spouse work; and if so, where, and what does your spouse do at work?
    - (2) If your spouse is presently retired or unemployed, what was his or her previous employment?
    - (3) If your spouse is a homemaker, has he or she ever been employed outside the home? If so, in what capacity?
6. Please state the number of children or step-children you have, if any; their age; their marital status and location of their residence; and if employed, the name of their employer and the type of work they do.
7. Have you or a member of your family ever served in the military?
- a. If so, who? What branch? Dates of service?
  - b. If so, what duties were performed while in the military?
  - c. If so, what was the highest rank held?
  - d. If so, what type of discharge was received?
8. Do you belong to any social or professional organizations?
- a. If so, do you hold any office with an organization you

have named?

**PART II.**

GENERAL QUESTIONS TO THE PANEL AS A WHOLE

1. Do any of you know Ricardo Pinder, Jr., the defendant in this case?
2. Do any of you know the defense attorneys, Vionnette Johnson or Natasha Perdew-Silas, either professionally or socially, or anyone in his office?
3. Trying this case on behalf of the United States is Jeffrey Brown, who is with the United States Attorney's Office for the Northern District of Georgia.
  - a. Do any of you know Mr. Brown?
  - b. Do any of you know Sally Quillian Yates, the United States Attorney for this District?
  - c. Do any of you know any other lawyer with the United States Attorney's Office for the Northern District of Georgia, or any of the support staff employees of that office?
4. **[To be asked if there is an affirmative answer to either question 2 or 3.]** Have you served as a juror in a case tried by the attorney that you have identified as knowing?
5. Seated at counsel table with Mr. Brown is Special Agents Strickland and Gray (Bureau of Alcohol, Tobacco, Firearms and Explosives).

- a. Do any of you know Special Agents Gray or Strickland?
- 6. Are any of you acquainted with any other member of this jury panel who have reported for jury service today?
- 7. Lito Graham and James Gordon are other persons named in the indictment.

Do any of you know these co-defendant?

- 8. Has any member of the panel ever served on a grand jury?
  - a. Was it a state or federal grand jury?
  - b. Where and when did you serve on the grand jury?
- 9. Has any member of the panel ever served on a trial jury?
  - a. Was it a civil or criminal case?
  - b. Where and when did you serve?
  - c. Were you the foreperson?
  - d. Did the jury you were on reach a verdict?
- 10. Has any member of the panel, or a close friend or family member, ever been arrested, charged or convicted of a criminal offense, other than for a minor traffic violation?
  - a. If so, please describe the nature of the offense, and about when it occurred, and how the matter was resolved.
  - b. Would this experience make it difficult for you to be a fair and impartial juror, if you were selected to serve in this case?
  - c. **If answer given described a violent crime:** Would this experience make it difficult for you to be a fair and

impartial juror in this case, which is a prosecution involving conspiracy to commit armed robbery?

11. Has any member of the panel, or a close friend or family member, ever been the victim of a crime?
  - a. If so, please briefly describe what happened, and when it occurred.
  - b. Was any one arrested and prosecuted for the offense?
  - c. Was the person convicted?
  - d. Did you or your family member or close friend appear as a witness at the trial?
  - e. Would this experience make it difficult for you to be a fair and impartial juror, if you were selected to serve in this case?
12. Excluding what has been already described about prior jury service and prior involvement with criminal-related matters, has any member of the panel, or a close friend or family member, ever been involved in a court proceeding of any kind?
  - a. If so, please describe.
  - b. Did you have to testify as a witness in the court proceeding?
  - c. Would that experience in court cause you to be biased against any of the parties in this case?
13. Has any member of the panel, or a close friend or family member, had an experience with any federal, state or local

agency (including police) that might affect your ability to serve as a fair and impartial juror?

14. Has any member of the panel, or a close friend or family member, been a party to a lawsuit or other proceeding involving either an agency of the United States or a state or local agency?
  - a. If so, please describe.
  - b. Was the matter resolved to your satisfaction?
  - c. Would that experience affect your ability to serve as an impartial juror?
15. Has any member of the panel, or a close friend or family member, ever received any legal training, practiced law, or worked in an attorney's office?
  - a. If so, please identify the person who has received such training and describe the type of training received.
  - b. If so, what type of law does the person practice and by whom is he or she employed?
16. Has any member of the panel majored in Criminal Justice in college, took Criminal Justice courses while in school, and/or has experience working in the Criminal Justice system as a law enforcement officer, probation officer, parole officer, or in some related position?
17. Has any member of the panel ever visited a jail or prison, whether to visit someone incarcerated, to bail someone out of

jail, or as part of a prison outreach program, or for any other reason? If so, would that experience make it difficult to serve as a fair and impartial juror?

18. This case will involve in part the use of testimony from persons who has been convicted of federal offenses and who are now cooperating with the United States in exchange for the possibility of receiving a reduced sentence.

a. Does any member of the panel object to the prosecution presenting trial testimony of convicted persons who are hoping to receive reduced sentences?

19. Would you tend to disbelieve or discount the sworn testimony of a witness solely because that witness has been granted immunity, meaning the witness has been promised that his or her testimony will not be used against them in Court?

20. Several law enforcement agencies, including local, state and federal officers, are involved in the investigation of this case. Does any member of the panel have any information or opinions regarding any federal, state or local law enforcement agency which would cause you to be biased for or against the United States?

21. Would any member of the panel tend to believe or disbelieve the sworn testimony of a witness solely because that witness is a police officer or federal agent?

22. Has any member of the panel, or a close friend or family



member, had an unpleasant experience with law enforcement that might affect your ability to serve as a fair and impartial juror?

23. Has any member of the panel, or a close friend or family member ever had an unpleasant experience with the Bureau of Alcohol, Tobacco, Firearms and Explosives, that might affect your ability to serve as a fair and impartial juror?
25. At the close of the case, the judge will instruct you on the law you must apply to the facts of this case.
  - a. Is there anyone who would be unwilling to follow the judge's instructions on the law?
  - b. Does anyone feel he or she would hesitate to follow the judge's instructions?
  - c. If you had an opinion on what the law should be and your opinion was different from the judge's instructions on what the law is, would you refuse or even hesitate to follow the judge's instructions?
26. Does any member of the panel have any moral, religious, or personal beliefs which would make you reluctant to serve on a criminal jury?
  - a. If so, would any of those principles make it difficult or impossible for you to judge a fellow citizen?
27. Does any member of the panel hold any beliefs, from whatever source, which would cause you to refuse to vote for convicting

a person, even though you felt the evidence proved that person was guilty beyond a reasonable doubt?

28. Does anyone have any hearing, sight or any other medical problems that might impair your ability to sit as a juror in this case and to devote full attention to this trial?
29. Is there any other reason whatsoever that you have not previously disclosed which would affect your ability to serve as a fair and impartial juror or which would cause you to prefer not to sit as a juror in this case?

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorney of record:

Vionnette Johnson, Esq.  
Federal Defender Program

This 6th day of August, 2010.

/s/Jeffrey A. Brown  
JEFFREY A. BROWN  
ASSISTANT UNITED STATES ATTORNEY  
Jeff.A.Brown@usdoj.gov